



Sept 8th 2015

U.S. Environmental Protection Agency
Office of Civil Enforcement; Air Enforcement Division
Marine ECA - Fuel Oil Non-Availability
1200 Pennsylvania Ave N.W.
Ariel Rios South Building, Mailcode 2242A
Washington, D.C. 20460

RE: FUEL OIL NONAVAILABILITY DISCLOSURE

To Whom It May Concern:

MAERSK LINE A/S is submitting a FOND for vessel
Gerd Maersk – IMO 9320245
NPDES Permit Tracking Number: VPAAY1350 .

This is an anticipatory filing. Dr. Lee Kindberg, our Environmental Director in North America, also has discussed this situation by telephone with Mike Moltzen, Deputy Director of the US EPA Office of Transportation Air Quality, and with Seema Kakede, an attorney with the US EPA Office of Enforcement (OECA). Dr. Kindberg also notified the California ARB OGV program staff.

This vessel was scheduled to take on additional ECA-compliant fuel in Shanghai (Yangshan) prior to sailing for Long Beach. Unfortunately, due to safety considerations during the typhoon, no fuel deliveries were allowed. The vessel has slightly less ECA compliant fuel on board than we believe will be required to complete the ECA transit to Long Beach.

Our plan to minimize impact on shore is as follows: The vessel is running higher speed at sea to allow lower speed and consumption in the ECA. Before entering the ECA the vessel will run on 1.05%S heavy fuel oil. The vessel will delay the initiation of the fuel switch until 2 hours prior to entering the ECA (standard procedure is to initiate at 6.5 hours before entering the ECA). The vessel will then be able to operate on 0.09%S MDO until additional fuel is delivered in Long Beach.



MAERSK
LINE

Previous data indicates sulfur content after 2 hours should be approaching the required 0.1% level. This plan will conserve compliant fuel so that the vessel is able to run on compliant fuel during most or all of the ECA transit, with any excess emissions at the ECA boundary rather than near shore.

I certify under penalty of law that the statements and information made herein are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines and imprisonment pursuant to 18 U.S.C. § 1001.

Designated Corporate Official:

Aslak Ross
Designated Person Ashore & Head of Marine Standards
Maersk Line - Ship Management
aslak.ross@maersk.com; +453363 3363 (ext 4665)

Signature

If you have any questions, please do not hesitate to contact us.

Sincerely,
MAERSK LINE A/S